

Franklin W. Olin College of Engineering  
D.T.E. 01-95

Information Request: BE-8-1

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-1      With respect to Mr. Joyce's reference to Mr. Hannabury's Affidavit ("Although some expenditures would be required for making the connection with [Wellesley Municipal Light Plant] . . . ") (Joyce Testimony at 5), please identify the specific facilities and pieces of equipment needed for the proposed interconnection. Please provide the cost figures for Wellesley Municipal Light Plant ("WMLP") to provide service to Franklin W. Olin College of Engineering ("Olin"), including presumed distances for interconnection, cost per foot, and total cost.

Response:      It would appear that the continuation of service from the central distribution point provides the most benefits to Olin. The WMLP has attempted to provide this information in its response to BE-8-3.

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Information Request: BE-8-2  
Respondent: Richard F. Joyce, Director  
Date: March 25, 2002

BE-8-2      With respect to WMLP's provision of service to the Massachusetts Water Resource Authority ("MWRA") facility in the Town of Needham, as referenced on page 5 of Mr. Joyce's testimony, please indicate: the purpose and function of the MWRA facility, the current and expected future load of such facility, and the distance and cost of WMLP's interconnection to such facility.

Response:      In order for Boston Edison's Vice President Charles W. Kiely to conclude (Exhibit A, paragraph 2):

1.      MWRA revenues do not warrant BECo's investment;
2.      MWRA's costs do not warrant BECo line extension; and
3.      WMLP's distribution line is closer.

BECo must have had the information that it is now requesting the WMLP to provide.

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Information Request: BE-8-3

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-3 Please reference Mr. Joyce's statement on page 7 of his testimony that, with regard to WMLP's provision of service to Olin, "[t]he primary benefit to both Olin and WMLP is that the WMLP's distribution infrastructure is already in place." In the Olin and WMLP plans, see Attachment BE-1-5A, there is an indication that additional work must be completed before WMLP can provide permanent service to Olin. Please specifically list any additional work that would need to be completed by: (a) WMLP; or (b) Olin for WMLP to provide permanent service to Olin. Please also provide a detailed cost assessment of any and all such work.

Response: Mr. Joyce's testimony on page 7 that identifies this benefit pertains to the alternative of placing Olin's switchgear at the same location as the central distribution point. This is the same alternative that the WMLP/Babson have used in the past to provide electricity to Babson facilities in Needham. This is also the existing connection point for any electrical service to the Olin Campus. Since September 1999 (reference Mr. Joyce's response to BE-4-6) the WMLP has communicated its preference for this alternative. WMLP understands that this service alternative is Olin's preferred approach.

In order to connect the Olin switchgear to the WMLP's distribution infrastructure 200 feet of cable from WMLP manhole #24-1 to Olin's switchgear at the central distribution point will be required. The WMLP estimates the installation of this cable and the connection of Olin's switchgear to both the WMLP and Babson's automatic transfer switch will cost \$18,000.

The other alternative that Olin has considered for the placement of its switchgear is a plot of land located in Wellesley. WMLP understands that this placement is not the preferred approach. Donald Newell's WMLP cost estimate for this alternative is \$65,000.

WMLP's testimony set forth that the benefits to Olin exist from WMLP's distribution infrastructure is already in place. As is shown in this information response the WMLP testimony is supported and correct. WMLP would not have any knowledge with respect to Olin's costs.

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Information Request: BE-8-4

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-4 Please reference Mr. Joyce's statement on page 7 of his testimony that, with regard to WMLP's provision of service to Olin, "[t]he primary benefit to both Olin and WMLP is that the WMLP's distribution infrastructure is already in place." Please specifically list any work that WMLP has done since 1997 with regard to its "distribution infrastructure" for the provision of service to Babson College ("Babson")

Response: The WMLP has made significant capital investments before and since 1997 to its "distribution infrastructure". Most of the WMLP's investments provide a benefit to a multitude of customers. For example, since 1997 the WMLP has constructed approximately 3 miles of new duct banks and manholes on Route 9 and reconductored 2 supply lines and installed 2 additional lines from BECo Station 292 to WMLP Station 453. This work not only benefits Babson College, but also benefits approximately 7,000 other customers. The extent of distribution infrastructure improvements that the WMLP has invested in its system was recognized by La Capra Associates in its report to the Municipal Light Board. A redacted copy of the La Capra report was provided in response to BE-4-8. For your reference another copy is provided as Exhibit B.

A review of the WMLP's records identified an internal memorandum from Richard F. Joyce dated May 22, 1997 (more than 2 years prior to WMLP's initial meeting with Olin College) establishing a second supply to Babson College as priority capital work. A copy of this memorandum is included as Exhibit C. On October 26, 1998 the Municipal Light Board approved the second supply to Babson College. A copy of the October 1998 narrative summarizing this project is provided in Exhibit D.

It should be noted that the initial engineering and design work was completed by the WMLP's Electric Superintendent, Edmond Feloni prior to leaving the Town's employment in September 1996. Because BECo's Information Request specifically requested "distribution infrastructure" work since 1997 the WMLP did not attempt to locate Mr. Feloni's files.

The second supply to Babson was delayed in 1999 due to the emergency relocation of three supply lines within the Route 9 median as requested by the Mass Highway. The Route 9 relocation project also provided the WMLP with the opportunity to construct a new duct bank/manhole system from Elliot Street in Newton to WMLP's Cedar Street Substation. This project allowed the WMLP to install two new supply lines in 2000 and 2001 as well as Vista switchgear. With the installation of the Vista switchgear the WMLP was able to redesign the

second feed to an underground feed for reliability benefits. The WMLP just recently completed this project. See, the WMLP response BE-8-10.

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Information Request: BE-8-5

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-5      With respect to Mr. Joyce's reference to [D.P.U. 86-451](#)[D.P.U. 86-144](#) on page 5 of his direct testimony, please provide the following WMLP exhibits from that proceeding: Exhs. WBPW-1, 2, 4, 30, 33, 36, 37, 52, 53, 56 (including exhibits MRB-2, MRB-3, MRB-4, MRB-7, MRB 8, MRB-9), 73 and 107.

Response:   Boston Edison was a party to these proceedings and can access this information as easily as the WMLP.

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Information Request: BE-8-6

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-6      Please provide copies of any and all contracts, statutory grants of authority, permits, municipal orders, or grants of location WMLP has received from the Town of Needham authorizing WMLP to provide electric service to customers in Needham.

Response:      The WMLP would not typically receive any authorization or documentation from the Town of Needham to provide electric service within its municipality. The last three Needham customers/locations served by the WMLP were determined by:

1. Order of the DPU in proceedings D.P.U. 86-451 and D.P.U. 86-144;
2. settlement of Design/Housing Docket No. DTE 01-23; and
3. electric service to the MWRA (reference BE-8-2).

WMLP electric service to Olin College and the portion of Babson's campus located in Needham does not cross any public way. The WMLP is not aware of any requirement to receive authorization from the Town of Needham to supply electric service to these customers.

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Information Request: BE-8-7

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-7      Please refer to the question and answer on page 3 of Mr. Joyce's direct testimony ("Q. To your knowledge, has Boston Edison ever provided service to this particular area?" (emphasis added)). Please provide a detailed description of "this particular area," including a color-coded map specifically indicating "this particular area." Please also indicate whether the term "this particular area" refers to:

- (a) Olin's entire 70-acre parcel in Needham;
- (b) All of Babson's currently existing facilities and buildings located in Needham; or
- (c) The parking lot and associated street lighting, as discussed in Mr. Joyce's previous answer on page 3 of this testimony.

Response:      Boston Edison in its response to WMLP-2-6 when it answered "To the best of its knowledge, no" to the information request "Has Boston Edison ever provided electric service to the specific geographical area set forth in the response to Request WMLP-2-1 for which Olin College requests electric service pursuant to its Petition" has already answered this information request. Similarly in Boston Edison's response to the Information Request WMLP-2-10, "Please describe the type of service that Boston Edison provides to the location identified in response to WMLP-2-6, including but not limited to voltage, type of lines and capacity" when Boston Edison answered, "as stated in response to Information Request WMLP-2-6, given that the land was previously underdeveloped, it is not believed that Boston Edison has provided electric service to this specific area of Babson College owned or formerly owned land" Boston Edison answered this information request.

As Mr. Joyce testifies on the same page 3 of his testimony the property in question is the Olin College property that is currently before the Department pursuant to Olin College's Petition. In fact, this property is the only property that is before the Department in this case regarding which electric utility should provide service to it. As Mr. Joyce testifies WMLP has for decades provided electric service to this property that is before the Department in this case while BECO has not. As a customer choice matter Olin College, as a border customer, wants WMLP and not BECO to serve this described above property with electricity.



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Information Request: BE-8-8

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-8      Regarding Information Request BE-8-7, above, and the area referenced as "this particular area," please identify:

- (a) any and all WMLP equipment and facilities located in "this particular area;"
- (b) any other equipment and facilities (existing prior to the construction of the "temporary service" to serve Olin) used to distribute service received from WMLP to "this particular area" by a third party and identify such third party; and
- (c) any electric load (existing prior to the construction of the "temporary service" to serve Olin) located in "this particular area."

Response:      The WMLP has provided electric service to a central distribution point on the Babson College campus. For decades Babson College has delivered electricity received from the WMLP to its buildings and facilities located in Wellesley and Needham. WMLP's power has been used to provide electric service to facilities that are located on what is now the Olin College property that is before the Department in the Docket D.T.E. 01-95 pursuant to Olin's Petition. The WMLP power served the property before 1997.

Nothing has changed with respect to the service that is currently being provided to "this particular area"; the WMLP provides electricity to the central distribution point and Babson delivers the electricity to this area which was formerly a part of the Babson Campus.

The electric load delivered to "this particular area" is included with all of the other load provided by the WMLP to Babson facilities served from the central distribution point.

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Information Request: BE-8-9

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-9      With reference to Mr. Joyce's statement that "[t] he primary power supply from the WMLP would come from BECo's Newton Station 292's voltage regulated transformers" (Joyce Testimony at 9). Please explain the basis for this statement and include any supporting documentation.

Response:      Please reference WMLP's response to BE-8-10 and AutoCad drawings provided as part of WMLP's response in Attachment BE-7-3. Circuit 1511, which is the primary supply to Babson College, is fed from WMLP's Wellesley Hills Substation, Station 41. Circuit 1531, which is the backup supply to Babson College, is fed from Cedar Street Substation, Station 453.

Both the Wellesley Hills and Cedar St. substations are supplied from BECo's Station 292. Wellesley Hills is supplied by Station 292 Circuits 41-210, 41-211Y and 41-212. Cedar Street Substation is supplied by Station 292 Circuits 41-212, 453-213 and 453-214Y.

Exhibit E is a system one-line diagram of WMLP's high voltage electric supply system.

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Information Request: BE-8-10

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-10 With reference to Mr. Joyce's testimony concerning the "dedicated underground cable supply" (Joyce Testimony at 7) please describe this supply, including reference to the system diagrams or plans supplied in the Attachments to BE-7-3 and providing relevant line numbers and identification of the station from which this supply originates. For both the primary and the backup supply, please provide the total length of such supply lines and the portions of each that are underground and that are overhead.

Response: The recently completed second supply to Babson College (see response to BE-8-4) is not reflected on circuit maps that were supplied by WMLP under BE-7-3. The reason is that WMLP has not generated a map for this circuit (designated Circuit 1511).

WMLP is in the process of converting all of its AutoCad drawings into the Town of Wellesley's GIS system. In this conversion to GIS, existing circuits are being converted first. Once this is completed, all new circuits, like the Circuit 1511 that was recently completed to provide dedicated service to Babson College, will be incorporated directly into GIS for mapping purposes.

The two circuits which provide service to Babson College are: Circuit 1511, which is the primary supply to Babson College, and is fed from WMLP's Wellesley Hills Substation, Station 41 and Circuit 1531, which is the backup supply to Babson College, and is fed from Cedar Street Substation, Station 453.

The specific overhead and underground estimated distances for each circuit (in circuit feet) from the breaker position in each respective Station to the Babson College automatic transfer switchgear are shown below:

Circuit	Underground Cable	Overhead Wire	Total Length
1511	10,092 feet	0 feet	10,092 feet
1531	2,341 feet	7,439 feet	9,780 feet

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Information Request: BE-8-11

Respondent: Richard F. Joyce, Director

Date: March 25, 2002

BE-8-11      With reference to Mr. Joyce's testimony concerning the absence of power outages to this service area for at least the past seven years (Joyce Testimony at 8) please define the service area that is being referenced and indicate whether such statement includes momentary outages or other short duration outages during the operation of automatic switching equipment.

Response:      Mr. Joyce is referencing WMLP's electric service provided to the Babson College central distribution point.

The WMLP's definition of an outage is any loss of power for one minute or more. The momentary 1 or 2 second outage experienced during the operation of Babson's automatic transfer switch would not be classified as a power outage for WMLP purposes.

- Exhibit A: Charles W. Kiely's September 19, 2000 letter
- Exhibit B: La Capra Associates Report
- Exhibit C: Richard F. Joyce's Memorandum dated May 22, 1997
- Exhibit D: October 26, 1998, second supply narrative
- Exhibit E: Map of WMLP's interconnections with BECo from Stations 292 and 148.